

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL NO. 13-cr-10048-FDS
)	
KING BELIN,)	
Defendant.)	

**DEFENDANT’S MOTION TO ENLARGE DEADLINE FOR FILING DISPOSITIVE
MOTIONS AND TO EXCLUDE TIME**

Defendant, through counsel, hereby moves this Honorable Court to enlarge the deadline previously set for the filing of dispositive motions in this matter, Thursday, September 19, 2013, to Thursday, October 17, 2013. Counsel requests the additional time to complete his review of the discovery produced in the case, and to research and draft a motion to suppress. Undersigned counsel has consulted with Assistant United States Attorney John A. Wortmann for the government; the government assents to this request, and requests the government be allowed thirty days to respond to the Defendant’s motion.

On August 21, 2013, this Court ordered the exclusion of time under the Speedy Trial Act of 1974 (“STA”) until October 9, 2013, pursuant to 18 U.S.C. §3161(h)(7)(A). Defendant moves, with the assent of the government, that the Court order the exclusion of the time period between October 10, 2013 and October 17, 2013 from calculation under the STA, to allow for the continued review of discovery and the preparation and finalization of the motion to suppress. Based on the foregoing, both parties believe that the requested continuance in the interest of justice and that the resulting delay between October 9, 2013 and October 17, 2013 is excludable under 18 U.S.C. §3161(h)(7) and (h)(8).

WHEREFORE, the Defendant requests the Court grant the requested relief.

Respectfully submitted,
KING BELIN,
By his attorney,

/s/ Ian Gold
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Date: September 19, 2013.

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, September 19, 2013.

/s/ Ian Gold
Ian Gold